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Attorneys for Plaintiffs  
CG TECHNOLOGY DEVELOPMENT, LLC,  
INTERACTIVE GAMES LLC, AND  
INTERACTIVE GAMES LIMITED

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

CG TECHNOLOGY DEVELOPMENT, LLC,  
INTERACTIVE GAMES LLC, AND  
INTERACTIVE GAMES LIMITED,

## Plaintiffs and Counterclaim-Defendants,

V.

ZYNGA, INC.

## Defendant and Counterclaim-Plaintiff.

CASE NO. 3:17-cv-04354-RS

**STIPULATION AND [PROPOSED]  
ORDER FOR STAY PENDING INTER  
PARTES REVIEW**

Judge: Hon. Richard Seeborg

1        WHEREAS, Plaintiffs CG Technology Development, LLC, Interactive Games Limited, and  
2 Interactive Games, LLC (collectively, “Plaintiffs”) allege that Defendant Zynga, Inc. (“Zynga”)  
3 infringes various claims of U.S. Patent No. RE39,818 (the “‘818 patent”). On March 13, 2017,  
4 Bwin.Party (USA), Inc.; Bwin.Party Digital Entertainment PLC; Bwin.Party Entertainment (NJ),  
5 LLC; DraftKings, Inc.; FanDuel Inc.; FanDuel Limited; and GVC Holdings PLC, some of who are  
6 defendants in cases currently pending in the District of Nevada and District of Delaware, filed an  
7 Inter Partes Review Petition with the U.S. Patent and Trial Appeal Board (“PTAB”), having case  
8 number IPR2017-00902 (“IPR”), alleging that certain claims of the patent-in-suit are invalid;

9        WHEREAS, the PTAB instituted the ’818 IPR petition on October 18, 2017, with the  
10 PTAB’s final written decision scheduled for October 18, 2018;

11      WHEREAS, the Parties anticipate expending significant resources on this litigation,  
12 including discovery, claim construction, and potentially trial, during the pendency of the IPRs;

13      WHEREAS, the Parties agree that resolution of the pending IPR will streamline this  
14 litigation and may assist in the Parties’ efforts to reach a settlement agreement. For example, the IPR  
15 could impact claim construction issues. The IPR could also result in all the claims of the patents-in-  
16 suit being invalidated. A stay would, therefore, result in substantial savings for the Parties and would  
17 conserve judicial resources;

18      IT IS HEREBY STIPULATED, WITH THE COURT’S PERMISSION, AND AGREED, by  
19 the Parties, through their respective counsel, that the Court should vacate all deadlines in the above-  
20 captioned matter, including the Case Management Conference scheduled for November 9, 2017,  
21 and, with the Court’s permission, enter a stay of all proceedings in this matter pursuant to the  
22 agreement of the Parties described herein pending the PTAB’s final written decision on the IPR.  
23 With the Court’s permission, the Parties shall file a status report within ten days of the date on which  
24 the PTAB’s final written decision is rendered and shall file a copy of the decision as an attachment  
25 to the report. Upon notice of issuance of the PTAB’s final written decision to the Court, the stay is  
26 lifted subject to further order of the Court. In addition, with the Court’s permission, the Parties shall  
27 file a status report every six months from the date of the Court’s order granting a stay of this case.

28      IT IS SO STIPULATED.

1 By signature below, counsel for Plaintiffs attests the counsel for Defendant concurs in the  
2 filing of this paper.

3 Dated: November 6, 2017

4 FINNEGAN, HENDERSON, FARABOW,  
5 GARRETT & DUNNER, LLP

6 By: /s/ Anthony D. Del Monaco  
7 Anthony D. Del Monaco (*pro hac vice*)

8 Attorneys for Plaintiffs  
9 CG TECHNOLOGY DEVELOPMENT, LLC,  
INTERACTIVE GAMES LLC, AND  
INTERACTIVE GAMES LIMITED

10 Dated: November 6, 2017

11 DURIE TANGRI LLP

12 By: /s/ Raghav Krishnapriyan  
13 Raghav Krishnapriyan

14 Attorneys for Defendant  
15 ZYNGA INC

1                   **[PROPOSED] ORDER**

2 Pursuant to stipulation, **IT IS SO ORDERED**

3  
4 Dated: 11/6/17



5  
6 The Honorable Richard Seeborg  
7 United States District Judge  
8 Northern District of California

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